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Jeffrey M. Nelson Chief Legal Officer

December 3, 2018

VIA ELECTRONIC FILING

Jocelyn G. Boyd, Esquire Chief Clerk & Administrator Public Service Commission of South Carolina 101 Executive Center Drive, Suite 100 Columbia, South Carolina 29210

RE:

Application of Carolina Water Service, Incorporated for Approval to Charge

Actual Cost for Pumping Interceptor Tanks

Docket No. 2018-361-S

Dear Ms. Boyd:

The letter provides additional information from the Office of Regulatory Staff ("ORS") regarding the Application submitted by Carolina Water Service, Inc. ("CWS") for Approval to Charge Actual Cost for Pumping Interceptor Tanks ("Application").

CWS is limited by its Commission approved rate schedule to recover a flat fee of \$150 from the customer.

The Application does not provide sufficient safeguards for customers. ORS recommends the Commission adopt conditions similar to those adopted by the Commission in Docket No. 2007-359-WS Order 2008-492 for Total Environmental Solutions, Inc. related to work performed by the utility on customer grinder pumps in connection with interceptor tanks. Specifically, ORS requests the Commission consider the following condition to protect customers:

1. In the event the cost to access, pump and/or clean the solids interceptor tank is great than \$300, CWS should be required to provide the customer with an estimate of the cost of the Pumping Charge and receive customer approval prior to proceeding with the access,

Letter-Jocelyn G. Boyd Page 2 of 2 December 3, 2018

cleaning and/or pumping. The cost charged to the customer for access, cleaning and/or pumping should not exceed the customer's approved estimate.

As stated in our letter dated November 29, 2018, ORS recommends the Commission require CWS provide notice to effected customers prior to approval by this Commission in order to allow customers an opportunity to inform the Commission of their concerns related to the Application, should they choose.

If you have any questions, please do not hesitate to contact me.

Sincerely,

effrey M. Nelson

cc: All Parties of Record (via E-mail)